

REMARKS

Applicant appreciates the thorough review by the Examiner and the Examiner's suggested changes to correct the informalities in claims 14, 16, and 18. Appropriate amendments have been made to correct the informalities, as well as additional informalities in claims 4-6, 12-13, and 15.

The Examiner rejected claim 1 under the provisions of 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 4,505,614 issued to Anschutz (hereinafter the "Anschutz patent" or "Anschutz"). The Examiner objected to claims 2-6 as being dependent upon a rejected base claim and allowed claims 7-20.

Applicant respectfully submits that the Anschutz patent does not teach or suggest several features claimed in independent claim 1. The Anschutz patent discloses a centralizer 10 having cam arm units 18-21. Each cam arm unit is movable from a retracted to an active position by extension of hydraulic piston rods 68 of hydraulic cylinders 60. Once all of the cam arm units are in the active position, they may be locked with locking pin 74.

Claim 1 includes the claim elements of a "centralizer being movable between a restricted position and an unrestricted position in response to contact with a well tool moving through the passage" and "at least one spring that urges the centralizing member to the restricted position." The Examiner alleges that the centralizer of Anschutz can move toward the unrestricted position through contact with a well tool and that the hydraulic pistons of Anshultz satisfy the "spring" limitation.

Applicant respectfully submits that the centralizer of Anschutz does not move between an unrestricted position and a restricted position in response to contact with a well tool. Anschutz teaches that the "lateral forces of the riser tending to move it away from such centered position are thus resisted by the rollers, cam plates, trunnions and support blocks that are rigidly coupled

to the deck" and that "[t]his active position is established by moving the cam arm units" with the hydraulic pistons. Anschutz patent, col. 3, l. 68 to col. 4, l. 7. The cam arm units of Anschutz thus are not moveable in response to contact with a well tool but instead are moveable between unrestricted and restricted positions by activation of hydraulic pistons, the activation of which are not dependent upon contact with a well tool. Anschultz thus does not teach or suggest a centralizer that is movable between unrestricted and restricted positions in response to contact with a well tool.

Applicant further submits that Anschutz does not teach or suggest a spring and that the pistons of Anschutz are not equivalent to the "spring" of claim 1. A hydraulically actuated piston has a physical structure and mode of operation completely different from that of a spring. Furthermore, the hydraulically actuated pistons of Anschultz are extended or retracted by an operator. In contrast, the spring of claim 1 urges the centralizing member to a restricted position independent from an operator.

For these reasons Applicant submits that Anschutz fails to teach or suggest all of the claim elements of claim 1, and that claim 1 therefore is patentable over the cited reference. Claims 2-6 are dependent upon patentable independent claim 1. Thus Applicant respectfully requests the Examiner remove the objections to claims 2-6.

CONCLUSION

Applicant respectfully submits that claims 1-20 are all in condition for allowance. Reconsideration of the application and allowance of all claims are respectfully requested, and Applicant respectfully requests the issuance of a Notice of Allowance.

Respectfully submitted,

Dated: June 2, 2006



Corey B. Blake, Reg. No. 52,624
BRACEWELL & GIULIANI LLP
P.O. Box 61389
Houston, Texas 77208-1389
Direct: 713/221-1515
Direct Fax: 713/222-3215

and

James E. Bradley, Reg. No. 27,536
BRACEWELL & GIULIANI LLP
P.O. Box 61389
Houston, Texas 77208-1389
Direct: 713/221-3301
Direct Fax: 713/222-3287
ATTORNEYS FOR APPLICANT